

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CWB SERVICES, LLC, *et al.*,

Defendants.

Case No. 4:14-cv-00783-DW

**JOINT MOTION FOR STAY OF TURNOVER PROCEEDINGS AS TO DNA
INVESTMENTS, LLC, DAVID A. HARBOUR AND ABBY HARBOUR**

Receiver, Larry E. Cook, Plaintiff, the Federal Trade Commission (“FTC”), David A. Harbour, individually and on behalf of DNA Investments LLC (“DNA”), and Abby Harbour, jointly propose a stay of all proceedings related to the Receiver’s Motion for Turnover of Property (ECF # 150) (the “Turnover Motion”) through and until April 30, 2016.

In support thereof, the undersigned respectfully states as follows:

1. The Receiver filed the Turnover Motion on March 31, 2015.
2. The FTC filed its Suggestions in Support of the Turnover Motion on May 8, 2015 (ECF # 157).
3. DNA and the Harbours filed their Suggestions in Opposition to the Turnover Motion on May 22, 2015 (ECF # 161) which set the Receiver’s Reply Suggestions deadline for June 8, 2015.

4. The parties subsequently agreed to extend the Receiver's Reply Suggestions deadline to June 29, 2015 as reflected by the Court's Order Granting Joint Motion for Extension of Time (ECF # 164).

5. The parties have reached a settlement of the Turnover Motion pursuant to which the final installment payment is not due until April 1, 2016.

6. By April 30, 2016, the parties will know whether the terms of the settlement have been met (in which case the Turnover Motion will be withdrawn by the Receiver) or not (in which case the Receiver will notify the Court the Turnover Motion proceedings should resume).

WHEREFORE, the Receiver, the FTC, David A. Harbour, individually and on behalf of DNA, and Abby Harbour respectfully request that the Court grant this motion and stay all further proceedings on the Turnover Motion until April 30, 2016.

Dated: June 26, 2015

Respectfully submitted,

LATHROP & GAGE LLP

/s/ Brian M. Holland

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*Attorneys for David A. Harbour, Abby Harbour, and
DNA Investments LLC*

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2015, I electronically filed the foregoing document with the Clerk of the Court for the Western District of Missouri using the CM/ECF system, which will send a notice of electronic filing to all parties participating in the Court's CM/ECF system.

/s/ Brian M. Holland